

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
<b>v.</b>	:	<b>CRIMINAL NO.</b>
		<b>14-574-PBT-01, 02, 03</b>
<b>DEVOS LTD. D/B/A GUARANTEED</b>	:	
<b>RETURNS,</b>		
<b>DEAN VOLKES,</b>	:	
<b>DONNA FALLON</b>		

**UNITED STATES' MOTION TO SEAL ITS RESPONSE  
TO DEFENDANTS' PRETRIAL MOTIONS**

The United States of America, by and through its attorneys, Zane David Memeger, United States Attorney, Nancy Rue, and Jennifer C. Barry, Assistant United States Attorneys, in and for the Eastern District of Pennsylvania, respectfully moves for an Order sealing the United States' Response To Defendants' Pretrial Motions (the "Response"). The Response discusses information contained in search and seizure affidavits that were filed under seal and that remain partially under seal. Defendants' Pretrial Motions and Memorandum of Law In Support were also filed under seal. Thus, to comply with sealing orders that were previously obtained, the United States

respectfully requests that the Court direct that the Response be filed under seal. The United States will file a redacted version of the Response on the public docket.

Respectfully submitted,

ZANE DAVID MEMEGER  
United States Attorney

/s/ Nancy Rue  
Nancy Rue  
Jennifer C. Barry  
Assistant United States Attorneys

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** :

**v.** : **CRIMINAL NO. 14-574-PBT**

**DEVOS LTD. D/B/A GUARANTEED** :  
**RETURNS, et al.**

**ORDER**

AND NOW, this \_\_\_\_ day of December, 2015, it is hereby

**ORDERED** that the United States' Motion to Seal Its Response to Defendants' Pretrial Motions is **GRANTED**. It is ordered that the United States' Response to Defendants' Pretrial Motions is filed under **SEAL** and that it remain under seal under further order of the Court. The United States shall file a redacted version of this document on the public docket.

BY THE COURT:

\_\_\_\_\_  
HONORABLE PETRESE B. TUCKER  
Chief Judge, United States District Court

**CERTIFICATE OF SERVICE**

I certify that the foregoing United States' Motion To Seal Its Response to Defendants' Pretrial Motions was served by the Electronic Court Filing System on all counsel of record.

/s/Nancy Rue  
Nancy Rue  
Assistant United States Attorney